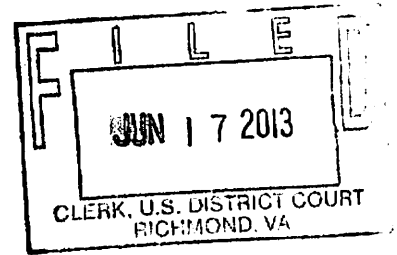


**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**



FORD MOTOR COMPANY

Plaintiff,

v.

NATIONAL INDEMNITY COMPANY

Defendant.

Civil Action No. 3:12-cv-839

**STIPULATED PROTECTIVE ORDER  
REGARDING DISCOVERY FROM JOHN YACoub**

WHEREAS Defendant National Indemnity Company ("NICO") has named John Yacoub on its Fed. R. Civ. P. 26(a)(1) disclosures as a witness it may call at trial;

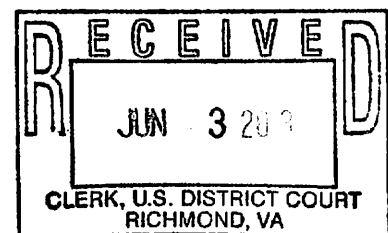
WHEREAS Plaintiff Ford Motor Company ("Ford") has requested deposition testimony from Mr. Yacoub;

WHEREAS Mr. Yacoub has agreed to appear voluntarily for such deposition subject to the conditions set forth below; and

WHEREAS, Ford and NICO (collectively the "Parties") agree to these conditions in consideration of the time and expense Mr. Yacoub's voluntary appearance will save the Parties as compared to seeking a formal subpoena for his appearance;

**IT IS HEREBY STIPULATED AND AGREED THAT:**

1. Nothing with respect to Mr. Yacoub's agreement to cooperate with, or his participation involving, depositions under the auspices of this action shall be construed as HDI-Gerling Industrie Verisicherung AG's ("HDI-Gerling") consent to the jurisdiction of this Court for any reason;



2. The law firm of Quinn Emanuel Urquhart & Sullivan LLP ("Quinn Emanuel") may represent Mr. Yacoub with respect to any and all matters concerning Mr. Yacoub's agreement to cooperate with respect to depositions in this action, and nothing about this representation shall be construed as Mr. Yacoub's or HDI-Gerling's consent to, or waiver of their right to challenge, the jurisdiction of this Court for any reason;
3. By cooperating with these depositions, HDI-Gerling is not making an appearance in this Court, and Mr. Yacoub and HDI-Gerling do not consent to the jurisdiction of this Court.

It is so ORDERED.

Dated: June 14 <sup>REP</sup>, 2013

/s/ REP  
Robert E. Payne  
Date: June 14, 2013

**FORD MOTOR COMPANY**

By: [Signature]  
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**NATIONAL INDEMNITY COMPANY**

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